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 and Panasonic Corporation of North America*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

IN RE OPTICAL DISK DRIVE  
 PRODUCTS ANTITRUST LITIGATION

MDL Docket No. 3:10-md-02143-RS-JCS

This document relates to:

Case No.: 3:13-cv-05372-RS-JCS

Ingram Micro Inc., et al.,  
 Plaintiffs,

v.

LG Electronics, Inc., et al.,  
 Defendants.

**DEFENDANTS PANASONIC  
 CORPORATION'S AND PANASONIC  
 CORPORATION OF NORTH  
 AMERICA'S AND PLAINTIFFS  
 INGRAM MICRO INC.'S AND  
 SYNEX CORP.'S STIPULATION TO  
 AND ~~PROPOSED~~ ORDER FOR  
 DEADLINES FOR INGRAM MICRO.  
 INC'S AND SYNEX CORP.'S FINAL  
 PRODUCTION OF DOCUMENTS  
 AND SUPPLEMENTAL RESPONSES  
 TO INTERROGATORIES**

Hon. Richard Seeborg  
 Hon. Joseph C. Spero, Magistrate Judge

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2  
3 WHEREAS, Defendant Sony Corporation served Plaintiffs Ingram Micro Inc. (“Ingram”) and SYNnex Corporation (“SYNNEX”) (collectively, “Plaintiffs”) with its first set of  
4 interrogatories and requests for production (collectively, “Sony Requests”) on April 4, 2016;

5  
6 WHEREAS, Plaintiffs and Defendant Sony Corporation agreed to search terms and custodians in response to the Sony Requests on or around August 11, 2016;

7  
8 WHEREAS, following confirmation from SYNnex that one of the custodians previously negotiated with Sony did not hold a relevant position during the Relevant Time Period, and none  
9 had any responsibility for purchasing ODD Products during the Relevant Time Period, Defendants  
10 Panasonic Corporation and Panasonic Corporation of North America (collectively, “Panasonic”) requested three replacement document custodians from SYNnex in response to the Sony Requests  
11 on or around October 13, 2016;

12  
13 WHEREAS, Panasonic served Plaintiffs with its first set of contention interrogatories (the  
14 “Interrogatories”) and requests for production (the “Requests”) on August 30, 2016;

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16 WHEREAS, Plaintiffs served responses and objections to the Interrogatories on October 3, 2016;

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18 WHEREAS, Panasonic and Plaintiffs met and conferred to discuss Panasonic’s position that Plaintiffs’ responses to the Interrogatories were not sufficient, and Plaintiffs agreed to provide  
19 substantive answers by Friday, October 28, 2016;

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21 WHEREAS, Plaintiffs requested a provisional extension for their responses to Interrogatory Nos. 21, 22, and 23 to November 4, 2016, and Panasonic agreed to entertain a request for an  
22 extension to November 4, 2016 upon good cause shown for any delay;

23  
24 WHEREAS, Ingram served its supplemental responses to all Interrogatories on Friday, October 28, 2016, and SYNnex served its supplemental responses to Interrogatory Nos. 1 through  
25 20 on October 28, 2016;

26  
27 WHEREAS, SYNnex served its supplemental responses to Interrogatory Nos. 21, 22, and

23 on November 11, 2016;

WHEREAS, Plaintiffs have agreed to provide further supplemental responses to the Interrogatories;

WHEREAS, Panasonic and Plaintiffs agreed that Plaintiffs would respond to the Requests (including the Sony Requests) through a rolling production of documents with a final production deadline of November 4, 2016;

WHEREAS, SYNnex's production of documents from the files of one new document custodian requested by Panasonic on or around October 13, 2016 was not complete as of November 18, 2016;

WHEREAS, Panasonic and Plaintiffs met and conferred on November 18, 2016 concerning Plaintiffs' supplemental interrogatory responses, document productions and depositions;

NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the undersigned counsel for the parties, that:

- 1) By Wednesday, December 7, 2016, Plaintiffs will provide full and complete supplemental Interrogatory responses, based on information currently available to Plaintiffs, including a response to Interrogatory Nos. 1, 5, 6, 8, 10, 16, 21, and 22; and
  - a. With respect to Interrogatory No. 1, Plaintiffs will include a chart or list of any specific meetings referenced in Paragraph 122 of Plaintiffs' Amended Complaint (ECF No. 1298);
- 2) If Panasonic does not find those supplemental Interrogatory responses to be satisfactory, the parties will have a final meet-and-confer, and, if necessary, will exchange initial motion to compel inserts no later than Wednesday, December 21, 2016 with an exchange of final inserts the following day; and
- 3) SYNnex will conclude its final production to Panasonic of any documents for any and all custodians with responsive documents to the Requests (including the Sony Requests) by Friday, December 2, 2016.

4) In the event that the parties are unable to confirm deposition dates for Plaintiffs' and Panasonic's fact and 30(b)(6) witnesses prior to the close of fact discovery on December 9, 2016, the parties agree that depositions of Ingram Micro and SYNnex requested by Panasonic or other Defendants, and the fact and 30(b)(6) depositions of Panasonic requested by Ingram Micro and SYNnex, will occur following the close of fact discovery at times mutually agreed to by the parties.

DATED: November 23, 2016

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Attorneys for Plaintiffs Ingram Micro Inc. and Synnex  
 Corporation

1  
2 **IT IS SO ORDERED.**

3 Dated: 12/8/16



Hon. Richard Seeborg  
United States District Judge